

Central Valley Regional Water Quality Control Board
23/24 September 2010 Board Meeting

Response to Comments
For the
Sage Canyon LLC
Somerston Winery
Tentative Order Waste Discharge Requirement

The following are Regional Water Quality Control Board, Central Valley Region (Central Valley Water Board) staff responses to comments submitted by interested parties regarding the tentative Order Waste Discharge Requirements (WDRs) for the Sage Canyon LLC (Discharger) Somerston Winery (Facility).

Tentative WDRs were issued for public comment on 23 July 2010 with comments due by 23 August 2010. The Central Valley Water Board received comments from the Discharger's consultant. The comments were received within the comment period.

The comments are summarized below, followed by Central Valley Water Board staff responses.

SAGE CANYON LLC (DISCHARGER) COMMENTS

Discharger Comment Nos. 1, 4, 6, 11, 18. Flow Limits

All of the comments listed above refer to the wastewater flow limit. In general, they state: that the winery facility is limited to the production of 150,000 gallons of wine per year. The industry standard for winery wastewater in Napa County is eight gallons of wastewater per gallon of wine produced. Therefore, the maximum annual flow is 1.2 million gallons. The Discharger comments that the winery wastewater varies and an average daily flow is misleading. Therefore, requests that the average daily flow in Finding 6 be deleted.

RESPONSE: Based on the additional information submitted by the Discharger and to make the WDRs consistent with other recently adopted winery WDRs, the order was revised from a maximum annual flow of 0.9 million gallons to 1.2 million gallons, a maximum daily flow rate was established, and the average daily flow listed in Finding 6 was deleted.

Discharger Comment Nos. 2, 3 Wine Production

The comment states that the proposed permit incorrectly states the amount of wine produced. .

RESPONSE: Central Valley Water Board Staff does concur. The order was revised to clarify that approximately 150,000 gallons of wine will be produced by crushing approximately 909 tons of grapes per year.

Discharger Comment No. 5. Final Filtration Process Equipment

The comment states that the mixed media filter for the final filtration of the treated wastewater is replaced with a spin disc filter.

RESPONSE: Finding 11.e. was revised to clarify the filtering mechanism.

Discharger Comment No. 7. Additional Information

The Discharger provided additional information on the chemicals used in the cleaning and sanitation processes performed at the facility.

RESPONSE: The Order was revised to include the additional information provided.

Discharger Comment Nos. 8, 14 Cover Crop

The comments state that the cover crop is not needed because the nutrient application rate is so low.

RESPONSE: Although the nutrient application rate is low, the cover crop provides additional crop uptake and land treatment of wastewater constituents. Central Valley Water Board staff believe the cover crop is an important consideration when determining the need for groundwater monitoring.

Discharger Comment Nos. 9, 13. Section B. Discharge Specifications.

The comments states that irrigation amounts vary from year to year depending on climatic conditions. And therefore requests that seasonal discharge limits to be applied to the land application areas be replaced with a yearly maximum limit not to exceed 1.2 million gallons.

RESPONSE: The Order was revised to include a monthly maximum and an annual maximum flow limit for wastewater discharges to the land application areas. The Discharger submitted a revised water balance supporting the flow limit request.

Discharger Comment No. 12. Sprinkle Irrigation Use Clarification

The comment states that sprinkler irrigation will be used for frost protection purposes and treated wastewater will not be used for frost protection.

RESPONSE: The Order was revised to clarify the sprinkler irrigation water source.

Discharger Comment No. 15. Potassium

The comment states that the vines are expected to remove all the applied potassium and projects an annual potassium application of 25 lb/ac/yr, below the total requirement of 195 lb/ac/yr.

RESPONSE: The Central Valley Water Board concurs. The Discharger's comment is addressed in Finding 30.a.

Discharger Comment No. 16 Land Use Description

The Discharger requests to include an additional description of the land use in Finding 42.

RESPONSE: Revised description of the land use surrounding the site was added to the Order.

Discharger Comment No. 17 Surface Water Description

The Discharger requests to include an additional description of the surface water in Finding 49.

RESPONSE: Revised description of the surface water was added to the Order.

Discharger Comment No. 19. Section C. Effluent Limitations

The comment seeks effluent limitations that can not easily be sampled.

RESPONSE: The Order was revised to include a monthly maximum and annual average TDS that is based on the source water quality, the wastewater treatment, wastewater application rates, the crop nutrient uptake rates, supplemental irrigation water, and the irrigation water quality. The limits selected will provide groundwater quality protection and allow the Discharger to operate the facility with salinity source control.

Discharger Comment Nos. 20, 21, 22, 23, 24. Section D. Land Application Area Requirements

The comments address land application area requirements, some of the comments can be accommodated, but other were not.

RESPONSE: The Central Valley Water Board staff had the following responses:

LAA No. 7. – Public notice of the use of reclaimed water is a standard requirement of WDRs.

LAA No. 8.- Although the Discharger does not plan to use sprinkler irrigation, those plans may change. LAA No. 8. provides flexibility in the Order.

LAA No. 9.- Public notice, as stated above is standard requirements of WDRs.

LAA No. 10.- The requirement is intended to prevent mosquito breeding. If the features do not exist at the facility there should not be a problem.

LAA No. 11.- The requirement is intended to prevent odor nuisance issues and accidental waste discharges for the protection of the general public.

Discharger Comment No. 25. Section E. Solids/Sludge Disposal

The comment states that the solids from the winery wastewater are applied to the land application area and the statement should reflect such activity in addition to offsite disposal.

RESPONSE: The Order was revised to describe the activity.